

# EXHIBIT A

**DEFAULT JUDGMENT MOTION COVER SHEET****MDL MOVING PAPERS**Motion: ECF No. 10909Memorandum of law: ECF No. 10909Declaration & supporting exhibits: ECF No. 10910**PLAINTIFFS**

Please describe each set of plaintiffs requesting judgments in this motion.

<b>Exhibit</b>	<b>Description of Plaintiffs</b>	<b>Cause(s) of Action</b>
<b>B</b>	Non United States national solatium plaintiffs	FSIA (28 USC ss. 1605, 1605A, 1605B);
	w/o prior judgments	common law

**DEFENDANTS**

Please list all defendants the plaintiffs are moving against:

Islamic Republic of Iran**COMPLIANCE**

As stated in ECF No. 10910 at ¶ 3-5, counsel followed the quality control measures outlined in ECF No. 3433 and adopted in ECF No. 3435.

As stated in ECF No. 10910 at ¶ 5 and 9, these plaintiffs have not previously received judgments against these defendants.

Excel versions of any tables attached to the proposed order were emailed to [Netburn\\_NYSDChambers@nysd.uscourts.gov](mailto:Netburn_NYSDChambers@nysd.uscourts.gov) on 04 / 30 / 2025.

**SUBJECT MATTER JURISDICTION**

- ☒ The Court previously addressed subject matter jurisdiction over these claims in ECF No. 3021 and 10790
- ☐ The Court has not previously addressed subject matter jurisdiction over these claims.

**PERSONAL JURISDICTION**

- ☒ The Court previously addressed personal jurisdiction over these defendants in ECF No. 3021 and 10790
- ☐ The Court has not addressed personal jurisdiction over these defendants.

**FACTUAL & LEGAL QUESTIONS**

- ☐ This motion requests ☐ new functional equivalence findings; ☐ new personal injury assessments; or ☒ resolution of a new issue: non-U.S. nationals seeking solatium awards
- ☒ This motion does not raise novel factual or legal issues.

## RELEVANT FILINGS

For each member case, list docket entries for the corresponding filings. Duplicate this page if additional space is needed.

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